

**U.S. CUSTOMS AND BORDER PROTECTION
CAFRA SEIZED ASSET CLAIM FORM**

Name: Fares Albahr Case Number: 2022150300012801
Address: c/o Steven Trapp, Esq. Telephone No: (216) 308 7333
~~1797 Pearl Rd.~~
Brunswick OH 44212

**IMPORTANT: BE SURE TO COMPLETE ALL PARTS BELOW.
THIS CLAIM FORM MUST BE SIGNED BY THE CLAIMANT HIS OR HER
SELF, NOT BY THE ATTORNEY OR OTHER REPRESENTATIVE ACTING
ON BEHALF OF THE CLAIMANT.**

As authorized by 18 U.S.C. § 983(a)(2)(A), I request that the Government file a complaint for forfeiture on the seized property described below:

PART I


List all the items in which you claim an interest. Include sufficient information to identify the items, such as serial numbers, make and model numbers, aircraft tail numbers, photographs, and so forth. Attach additional sheets of paper if more space is needed. - see attached statement

PART II

State your interest in each item of property listed above. Attach additional sheets of paper if more space is needed. - included in attached statement referenced above,

PART III (ATTESTATION AND OATH)

I attest and declare *under penalty of perjury* that the information provided in support of my claim is true and correct to the best of my knowledge and belief.

Fares Albahr 8/15/2023
Name (Print) Date

Signature

A FALSE STATEMENT OR CLAIM MAY SUBJECT A PERSON TO
PROSECUTION UNDER 18 U.S.C. § 1001 AND/OR 1621 AND IS PUNISHABLE
BY A FINE AND UP TO FIVE YEARS IMPRISONMENT.



(ATT 8-H: Revised November 2014)

ELECTION OF PROCEEDINGS - CAFRA FORM

NOTE: READ THE ATTACHED NOTICE OF SEIZURE AND INFORMATION FOR CLAIMANTS BEFORE YOU FILL OUT THIS FORM. THIS FORM SHOULD BE COMPLETED AND RETURNED TO U.S. CUSTOMS AND BORDER PROTECTION (CBP) at FPF OFFICE, 1901 CROSS BEAM DR., CHARLOTTE, NC 28217.

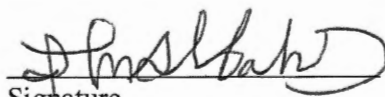
I understand that property in which I have an interest has been seized by CBP/U.S. Immigration and Customs Enforcement (ICE) under case number 2022150300012801.

Check ONLY ONE (1) of the following choices:

- ☐ 1. **I REQUEST THAT CBP CONSIDER MY PETITION ADMINISTRATIVELY BEFORE FORFEITURE PROCEEDINGS ARE INITIATED.** My petition is attached. By making this request, I understand that I can request, in writing, that my case be referred for judicial forfeiture proceedings at any time prior to the completion of the administrative forfeiture proceedings or as set forth in the notice of seizure. If I choose to wait for an administrative decision on my petition, my deadline for filing a claim as required by 18 U.S.C. § 983(a)(2)(B) is 60 days from the date of the petition decision; or, if I choose to file a supplemental petition, my deadline for filing a claim as required by 18 U.S.C. § 983(a)(2)(B) is 60 days from the date of the supplemental petition decision. If I file a complete "Seized Asset Claim" form or other claim consistent with the requirements of 18 U.S.C. § 983(a)(2)(C), CBP consideration of my petition will stop and the case will be sent to the United States Attorney's Office for judicial forfeiture proceedings.
- ☐ 2. **I REQUEST THAT CBP CONSIDER MY OFFER IN COMPROMISE ADMINISTRATIVELY BEFORE FORFEITURE PROCEEDINGS ARE INITIATED.** My offer is attached. By making this request, I understand that I can request, in writing, that my case be referred for judicial forfeiture proceedings at any time prior to the completion of the administrative forfeiture proceedings or as set forth in the notice of seizure. If I choose to wait for an administrative decision on my offer, my deadline for filing a claim is 30 days from the date of the decision. If I file a complete "Seized Asset Claim" form or other claim consistent with the requirements of 18 U.S.C. § 983(a)(2)(C), CBP consideration of my offer will stop and the case will be sent for judicial forfeiture proceedings.
- ☐ 3. **I ABANDON ANY CLAIM OR INTEREST I MAY HAVE IN THE PROPERTY.** I understand that no additional notice about future proceedings concerning the property will be provided to me.
- ☒ 4. **I AM FILING A CLAIM AND REQUESTING THAT CBP REFER THE CASE FOR COURT ACTION.** Please send the case to the U.S. Attorney for court action. I have fully completed, signed and attached a "Seized Asset Claim" form. I understand that if I have not fully completed this form, or otherwise made a proper claim and request for judicial forfeiture pursuant to 18 U.S.C. § 983(a)(2)(C) within 35 days after the date the notice of seizure was mailed, CBP will treat any submission as a petition for relief without the ability to seek future judicial forfeiture proceedings.

Fares Albahr
Name (Print)

8/15/2023
Date


Signature

U.S. Customs and Border Protection
CAFRA SEIZED ASSET CLAIM FORM

PROPERTY LIST

Please let this serve as the Petition Fares Faisal Albahr's list of property, which he is the owner of:

- \$41,691.00 U.S. Dollars
- A blue notebook
- iPhone 13 pro 1 Terabyte
- iPhone 13 pro max 256 gb
- iPhone 12 Pro Max 256 gb
- iPhone XS 256 gb
- iPhone xmax 256 gb
- iPhone 6s 64 gb
- 1 bed sheet
- black garbage bags

ELECTION OF PROCEEDINGS - CAFRA FORM

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I understand that property in which I have an interest has been seized by CBP/U.S. Immigration and Customs Enforcement (ICE) under case number 2022150300012801.

Check **ONLY ONE** (1) of the following choices:

- ☒ 1. I REQUEST THAT CBP CONSIDER MY PETITION ADMINISTRATIVELY BEFORE FORFEITURE PROCEEDINGS ARE INITIATED. My petition is attached. By making this request, I understand that I can request, in writing, that my case be referred for judicial forfeiture proceedings at any time prior to the completion of the administrative forfeiture proceedings or as set forth in the notice of seizure. If I choose to wait for an administrative decision on my petition, my deadline for filing a claim as required by 18 U.S.C. § 983(a)(2)(B) is 60 days from the date of the petition decision; or, if I choose to file a supplemental petition, my deadline for filing a claim as required by 18 U.S.C. § 983(a)(2)(B) is 60 days from the date of the supplemental petition decision. If I file a complete "Seized Asset Claim" form or other claim consistent with the requirements of 18 U.S.C. § 983(a)(2)(C), CBP consideration of my petition will stop and the case will be sent to the United States Attorney's Office for judicial forfeiture proceedings.
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Fares ALBAHR
Name (Print)

07-27-2022
Date

[Signature]
Signature

STEVEN J. TRAPP, ATTORNEY AT LAW, LLC

Steven J. Trapp, Esq.
1797 Pearl Rd.
Brunswick, OH 44212

Brennan Manna Diamond – Of Counsel
200 Public Square
Cleveland, OH 44114

Phone: (440) 522-1009
Fax: (330) 220-2106
stevenjtrapp@gmail.com

July 28, 2022

U.S. Customs and Border Protection
FPF Office
Terese A. Weaver/Angela Holt
1901 Cross Beam Dr.
Charlotte, NC 28217

Via Email: ANGELA.M.HOLT@CBP.DHS.GOV

RE: *Case Number: 2022150300012801*

Dear Ms. Holt and Ms. Weaver:

Please let this letter serve as the Petition of Fares Faisal Albahr seeking remission of Mr. Albahr's personal property, \$41,691 in US Currency, seized from him on or about May 13, 2022 in Nash County North Carolina. Mr. Albahr also had the following property seized on this date:

- A blue notebook
- iPhone 13 pro 1 Terabyte
- iPhone 13 pro max 256 gb
- iPhone 12 Pro Max 256 gb
- iPhone XS 256 gb
- iPhone xmax 256 gb
- iPhone 6s 64 gb
- 1 bed sheet
- black garbage bags

There was no basis to seize and subject to forfeiture the property of Mr. Albahr under 18 USC 981(a)(1)(A), 18 USC 1956(c)(7)(A), 18 USC 1961(1)(B), 18 USC 2342 – Trafficking in Contraband Cigarettes or Smokeless Tobacco – or 18 USC 981(a)(1)(C), 18 USC 1956(c)(7), 18 USC 1961(1) – Proceed of Unlawful Activity.

Neither Nash County, U.S. Immigration and Customs Enforcement (ICE), or U.S. Customs and Border Protection have provided any evidence in support of the allegations that Mr. Albahr has violated the federal statutes cited in the Notice of Seizure and Information to Claimants CAFRA Form.

As there was no basis to seize Mr. Albahr's personal property and no evidence has been produced to support the forfeiture of this property, the property must be returned to Mr. Albahr immediately.

Mr. Albahr comes from a wealthy and large family in Yemen. He personally owns a significant amount of land in Yemen. Moreover, he has many business contacts from the Yemeni

community in the USA. Mr. Albahr is a respected mediator in the Yemeni community. He has mediated domestic and business disputes in New York City. On that date he was pulled over and his property seized Mr. Albahr was in transit to a mediation of a business transaction in North Carolina. He had in fact considered to invest and become a part of the business. As a result of all Mr. Albahr's phones being seized he was not able to attend that mediation.

Mr. Albahr recently became a U.S. Citizen and he is seeking to invest money and increase his business interests in the USA. Much of Mr. Albahr's family and friends are entrepreneurs with the financial means and experience to assist him in starting a business. It is common in Mr. Albahr's family and community to loan money to be repaid in the future at 0% interest. Mr. Albahr's credit and reputation are being damaged by the ongoing seizure of his personal property.

In consideration of this petition Mr. Albahr respectfully requests that all personal property belonging to him be remitted to him promptly.

Sincerely,

Steven J. Trapp
Attorney for Fares Faisal Albahr

I affirm that all of the above is true and accurate.

Fares Albahr

community in the USA. Mr. Albahr is a respected mediator in the Yemeni community. He has mediated domestic and business disputes in New York City. On that date he was pulled over and his property seized. Mr. Albahr was in transit to a mediation of a business transaction in North Carolina. He had in fact considered to invest and become a part of the business. As a result of all Mr. Albahr's phones being seized he was not able to attend that mediation.

Mr. Albahr recently became a U.S. Citizen and he is seeking to invest money and increase his business interests in the USA. Much of Mr. Albahr's family and friends are entrepreneurs with the financial means and experience to assist him in starting a business. It is common in Mr. Albahr's family and community to loan money to be repaid in the future at 0% interest. Mr. Albahr's credit and reputation are being damaged by the ongoing seizure of his personal property.

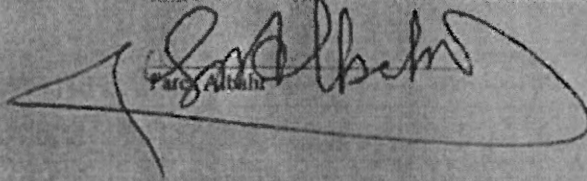
In consideration of this petition Mr. Albahr respectfully requests that all personal property belonging to him be remitted to him promptly.

Sincerely,



Steven J. Trapp
Attorney for Fares Faisal Albahr

I affirm that all of the above is true and accurate.



Fares Albahr

State of Ohio

County of Cuyahoga

AFFIDAVIT

I, Mohamed Al-Naham, first being duly sworn according to law, deposes and states the following is True:

1. My relationship to Fares Faisal Albahr is as follows: Cousin

2. I loaned Fares Faisal Albahr \$ 7,000 Seven thousand dollars
on or about 5/10/22 2022. The purpose of this personal loan was for:

To open small business to
work in and make a living.

The undersigned hereby affirms that the statements made in the foregoing affidavit are true. Affiant further sayeth nought.

NAME: Mohamed Al-Naham
ADDRESS: 117 Sioux Lane
Albrightsville, PA 18210

SIGNATURE: [Signature]

NOTARY PUBLIC

Before me personally appeared Mohamed Al-Naham who sworn to and
subscribed to the above in my presence this 13th day of July, 2022.

[Signature]
NOTARY PUBLIC

My commission expires: NONE

State of Ohio

County of Cuyahoga

AFFIDAVIT

I, Abraham Al-Bahr first being duly sworn according to law, deposes and states the following is True:

1. My relationship to Fares Faisal Albahr is as follows: Cousin.
2. I loaned Fares Faisal Albahr (\$ 9,500) Nine Thousands and Five Hundreds \$
on or about May, 10th, 2022. The purpose of this personal loan was for: Opening a small business.

The undersigned hereby affirms that the statements made in the foregoing affidavit are true. Affiant further sayeth nought.

NAME: Abraham AL-Bahr
ADDRESS: 8133 Greenwood View dr # 803
Parma, OH 44129
SIGNATURE: [Signature]

NOTARY PUBLIC

Before me personally appeared Abraham Al-Bahr who sworn to and
subscribed to the above in my presence this 10th day of July 2022.



STEVEN J. TRAPP
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.

[Signature]
NOTARY PUBLIC

My commission expires: NONE

AFFIDAVIT

I, IBRAHIM YAFEA, first being duly sworn according to law, deposes and states the following is True:

1. My relationship to Fares Faisal Albahr is as follows: Close Friend

2. I loaned Fares Faisal Albahr \$ 17,000 in separate transactions.

on or about May, 7th 2022. The purpose of this personal loan was for: Opening a small business. And to buy land from him in future.

The undersigned hereby affirms that the statements made in the foregoing affidavit are true. Affiant further sayeth nought.

NAME: Ibrahim Yafea
ADDRESS: 18520 Hillside Ave
Jamica, NY, 11432

SIGNATURE: [Signature]

NOTARY PUBLIC

Before me personally appeared Ibrahim Yafea who sworn to and
subscribed to the above in my presence this 14 day of July, 2022.

ALAN ROBERT RATTNER
Notary Public, State of New York
No: 01RA3211825
QUALIFIED IN KINGS COUNTY
Commission Expires May 31, 2023

[Signature]
NOTARY PUBLIC

My commission expires: _____

State of Ohio
County of Cuyahoga

AFFIDAVIT

I, Nader ALBAHR first being duly sworn according to law, deposes and states the following is True:

1. My relationship to Fares Faisal Albahr is as follows: Cousin
2. I loaned Fares Faisal Albahr \$9,000, Nine Thousands dollars on or about May 8th 2022. The purpose of this personal loan was for: To start a new small bussiness.

The undersigned hereby affirms that the statements made in the foregoing affidavit are true. Affiant further sayeth nought.

NAME:

ADDRESS:

NADER ALBAHR
6871 AMES RD
Parma

SIGNATURE:

NOTARY PUBLIC

Before me personally appeared Nader Albahr who sworn to and subscribed to the above in my presence this 10th day of July, 2022.



STEVEN J. TRAPP
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.

[Signature]
NOTARY PUBLIC

My commission expires: NONE